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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SUNRISE HOSPITAL AND MEDICAL CENTER,  
LLC; SUNRISE MOUNTAINVIEW HOSPITAL,  
INC.; and SOUTHERN HILLS MEDICAL  
CENTER, LLC,

Plaintiffs,

vs.

BLUE CROSS OF CALIFORNIA D/B/A ANTHEM  
BLUE CROSS; ANTHEM BLUE CROSS LIFE AND  
HEALTH INSURANCE COMPANY; and KEENAN &  
ASSOCIATES, INC.,

Defendants.

Case No. 2:23-cv-01986-APG-EJY

**STIPULATION AND ORDER TO EXTEND  
PLAINTIFFS' TIME TO RESPOND TO  
THE ANTHEM DEFENDANTS' MOTION  
TO DISMISS PLAINTIFFS' FIRST  
AMENDED COMPLAINT AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT  
(ECF No. 37)**

**(SECOND REQUEST)**

Plaintiffs Sunrise Hospital and Medical Center, LLC; Sunrise Mountainview Hospital, Inc.;  
and Southern Hills Medical Center, LLC ("the Hospitals") and Defendants Blue Cross of California  
d/b/a Anthem Blue Cross and Anthem Blue Cross Life and Health Insurance Company (collectively,  
the "Anthem Defendants") (collectively, the "Parties") hereby stipulate as follows:

1. The Anthem Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint and  
Memorandum of Points and Authorities in Support ("Motion to Dismiss") in this action was filed on  
February 29, 2024 (ECF No. 37).

2. The Hospitals' current deadline to respond to the Motion to Dismiss is March 28, 2024.

3. Due to the schedules of the Hospitals and their counsel, the Hospitals require additional time to prepare their response to the Motion to Dismiss.

4. The Parties therefore stipulate and agree to extend the deadline for the Hospitals to file their response to the Motion to Dismiss to April 11, 2024.

5. This is the Hospitals' second requested extension. This stipulation is made in good faith and not to delay the proceedings.

Dated this 25th day of March, 2024.

Dated this 25th day of March, 2024.

**BAILEY ♦ KENNEDY**

**MCDOWELL HETHERINGTON LLP**

By: /s/ Joshua M. Dickey

By: /s/ Charles H. McCrea

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\*Pro Hac Vice petition to be submitted.

*Attorneys for Defendants Blue Cross of California  
d/b/a Anthem Blue Cross and Anthem Blue Cross  
Life and Health Insurance Company*

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

DATED: April 2, 2024